

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE SUBPOENA ISSUED TO
COMPUSA, INC.

3-07 mc 0017-N
related case: 3-07 mc 0018-P

**RESPONDENT LG.PHILIPS LCD CO., LTD.'S CORRECTED RESPONSE IN
OPPOSITION TO TATUNG'S MOTION FOR PROTECTIVE ORDER**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Plaintiff/Respondent LG.Philips LCD Co., Ltd. ("LPL") hereby opposes the Motion for Protective Order tardily filed by Defendants Tatung Company and Tatung Company of America, Inc. (collectively "Tatung") with respect to the third party subpoena served by LPL on CompUSA, Inc. (*See* Appendix RESP 0002-00015).

The matter presented to this Court concerns Motions to Quash deposition subpoenas filed by the Defendant Tatung, not by the proposed deponents, who are not parties to the Main Case.

Tatung has filed numerous motions in various district courts, including this Court, to quash LPL's deposition subpoenas served on a number of third party witnesses in a patent infringement action pending in the United States District Court in Delaware filed as Case Number 04-cv-00343-JJF, ("Main Case").

For the reasons explained in LPL's contemporaneously filed Brief in Support of this Response, LPL requests that this matter be transferred to the District Court in Delaware, or alternatively, that Tatung's motion be denied.

Respectfully Submitted,

s/Frank L. Broyles
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On March 15, 2007, a genuine copy of the foregoing and referenced Appendix was served via email on the persons shown on the service list attached on the next page. Additionally, a copy will be served by First Class Mail on March 16, 2007.

s/Frank L. Broyles

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